

*Karen Ladner Ruhr*  
HANCOCK COUNTY CIRCUIT CLERK  
152 MAIN STREET, SUITE B  
BAY ST. LOUIS, MISSISSIPPI 39520

228-467-5265  
228-467-5266  
228-467-2779 Fax

GULFPORT: 228-868-1913  
TOLL FREE: 1-800-771-9942

CERTIFICATE OF CLERK AS TO CERTIFIED COPY

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

I, Karen Ladner Ruhr, Clerk of the Circuit Court of the said County and State, hereby certify  
that the foregoing pages contain a true and correct copy of the file from the Circuit Court of said  
County and State in Cause number 12-0103 Styled:

TROUT POINT LODGE LIMITED, A Nova Scotia  
Limited Company  
VAUGHN PERRET AND CHARLES LEARY


VS

DOUG K. HANDSHOE

as the originals of same appear of record and file in my office.

Given under my hand and official seal affixed, this the 28<sup>TH</sup> day of March, 2012.

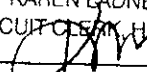
*Karen L. Ruhr*  
KAREN LADNER RUHR  
HANCOCK COUNTY  
CIRCUIT CLERK  
BY K. Coor D.C.



IN THE CIRCUIT COURT OF HANCOCK COUNTY  
STATE OF MISSISSIPPI

FILED

MAR 26 2012

KAREN LADNER RUHR  
CIRCUIT CLERK, HANCOCK CO.  
BY  D.C.

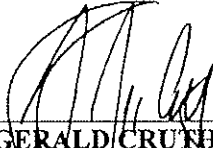
TROUT POINT LODGE, LIMITED, )  
A Nova Scotia Limited Company; )  
VAUGHN PERRET and )  
CHARLES LEARY, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
DOUG K. HANDSHOE, )  
 )  
Defendant. )

Civil Action No.: 12-0103

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

  
G. GERALD CRUTHIRD, Esquire  
Mississippi Bar No. 7926  
G. GERALD CRUTHIRD, P.A.  
Attorneys at Law  
P. O. Box 1056  
121 Fourth Street  
Picayune, MS 39466  
Telephone: (601) 798-0220  
Facsimile: (601) 798-4591  
Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

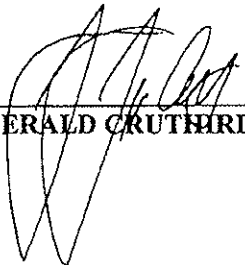
COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

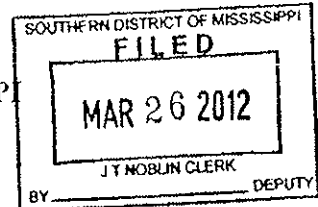
I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire  
Mississippi Bar No. 1774  
Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
2510 14<sup>th</sup> Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaird@joneswalker.com](mailto:hlaird@joneswalker.com)  
*Attorneys for Plaintiff*

THIS the 26<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
G. GERALD CRUTHIRD

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



TROUT POINT LODGE, LIMITED, )  
A Nova Scotia Limited Company; )  
VAUGHN PERRET and )  
CHARLES LEARY, )

Plaintiff, )

v. )

DOUG K. HANDSHOE, )

Defendant. )

Civil Action No.: 1:12cv90 LG-JMR

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 *et seq.*, Defendant, Doug K. Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and states as follows:

1. On March 8, 2012, Plaintiffs' filed their Motion to Enroll Foreign Judgment in the lawsuit styled *Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe*, Civil Action No. 12-0103, in the Circuit Court of Hancock County, Mississippi.

2. The Defendant, Doug K. Handshoe, was served with notice of such filing on or about March 9, 2012.

3. Removal is proper under 28 U.S.C. § 4103, because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via the internet by Defendant in securing rendition of a foreign judgment against Defendant in the Supreme Court of Nova

Scotia, Canada on or about February 2, 2012; and in response thereto Defendant has filed his suit in this Court, styled *Slabbed New Media, LLC, a Mississippi LLC, Douglas Handshoe vs. Trout Point Lodge, Limited, a Foreign Limited Company; Charles Leary and Vaughn Perret*, Civil Action No. 1:12-CV-00038-RHW, filed in the United States District Court for the Southern District of Mississippi, Southern Division, under the provisions of the Securing The Protection Of Our Enduring and Established Constitutional Heritage Act, pursuant to 28 U.S.C. Sections 4101, *et seq.*

4. Venue is proper in this district under 28 U.S.C. § 1441(a) because the State Court where the action has been pending is located in this district.

5. This Notice is being filed with this Court within thirty (30) days after Defendant received a copy of Plaintiffs' initial pleading, Motion to Enroll Foreign Judgment.

6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above described State Court action are attached hereto as Exhibit "A"; and that no other process, pleadings, or orders have been served upon Defendant to date in this action.

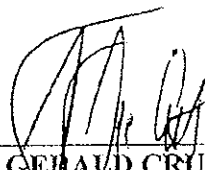
7. Defendant files this Notice without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.

8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which it may be justly entitled.

DATED: March 23, 2012

Respectfully Submitted,



---

**G. GERALD CRUTHIRD, Esquire**  
Mississippi Bar No. 7926  
G. GERALD CRUTHIRD, P.A.  
Attorneys at Law  
P. O. Box 1056  
121 Fourth Street  
Picayune, MS 39466  
Telephone: (601) 798-0220  
Facsimile: (601) 798-4591  
Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

**CO-COUNSEL FOR DEFENDANT**

**JACK E. "BOBBY" TRUITT, Esquire**  
The Trutt Law Firm, L.L.C.  
149 North New Hampshire Street  
Covington, LA 70433-3235  
Telephone: (985) 327-5266  
Facsimile: (985) 327-5252  
Mobile: (985) 778-1973  
Email: [btrutt@truttlaw.com](mailto:btrutt@truttlaw.com)

**CO-COUNSEL FOR DEFENDANT,  
APPEARING PRO HAC VICE**

CERTIFICATE OF SERVICE

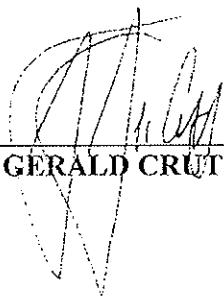
I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Defendant's Notice of Removal to the following:

Henry Laird, Esquire  
Mississippi Bar No. 1774  
Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
2510 14<sup>th</sup> Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaire@joneswalker.com](mailto:hlaire@joneswalker.com)  
*Attorneys for Plaintiff*

and have hand delivered a true and correct copy unto

Karen Ladner Ruhr  
Circuit Clerk of Hancock County, Mississippi  
152 Main Street, Suite B  
Bay St. Louis, MS 39520

THIS the 26<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
G. GERALD CRUTHIRD

CERTIFICATE OF CLERK

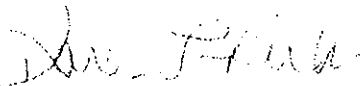
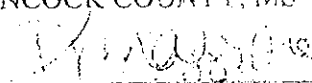
STATE OF MISSISSIPPI

COUNTY OF HANCOCK

I, Karen Ladner Ruhr, Circuit Clerk of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the complete file in Cause No.

12-0103 styled Trout Point Lodge et al versus Doug K. Handshoe as appears on file in my office this date.

Given under my hand official seal affixed, this the 14th day of March, 2012.

  
\_\_\_\_\_  
KAREN LADNER RUHR  
CIRCUIT CLERK  
HANCOCK COUNTY, MS  
By:  DC





IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

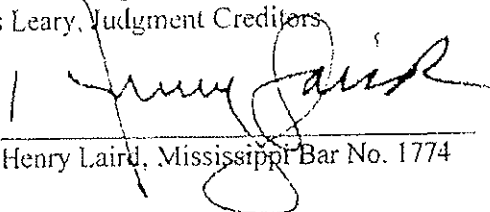
MOTION TO ENROLL FOREIGN JUDGMENT


COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8<sup>th</sup> day of March, 2012.

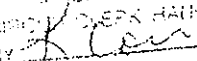
Trout Point Lodge, Limited, Vaughn Perret and  
Charles Leary, Judgment Creditors

By:

  
Henry Laird, Mississippi Bar No. 1774



MAR 08 2012

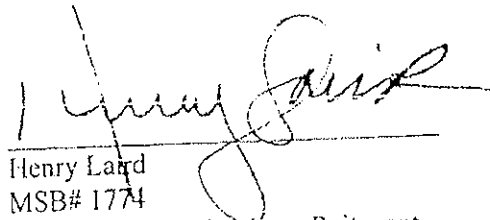
CLERK OF COURT  
DOUG K. HANDSHOE  
BY  00

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe  
345 Carroll Avenue  
Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

A handwritten signature in black ink, appearing to read "Henry Laird", is written over a horizontal line.

Henry Laird  
MSB# 1774  
Jones, Walker, Waechter, Poitevent,  
Carrère & Denègre, LLP  
2510 14th Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: hlaird@joneswalker.com

2011

IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jara Don

Defendants

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

A motion was made by Trout Point Lodge, Charles Leary, and Vaughn Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughn Perret, and having heard Charles Leary and Vaughn Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

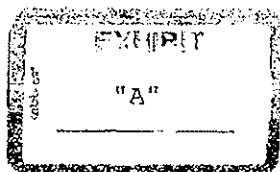
- to Trout Point Lodge; \$75,000 in general damages
- to Vaughn Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;
- to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the Defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the Plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughn J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Slabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.  
Dated 7<sup>th</sup> day of February, 2012.



Prothonotary

Elaine L. d'Entremont  
Prothonotary

or other communications which refer to the plaintiff by name, depiction, or description. If such material is hereinafter ordered to be immediately removed from publication.

Issued: February 12, 2012

Ernest A. Entremont  
Prothonotary  
By: [Signature]

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: \_\_\_\_\_

DOUG K. HANDSHOE

DEFENDANT

AFFIDAVIT OF HENRY LAIRD

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

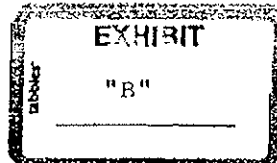
PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and  
State aforesaid the within named Henry Laird of Jones, Walker, Waechter, Poitevent, Carrère &  
Denègre, LLP, says the following things are true:

1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs  
and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: *Trout  
Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles  
Leary -vs- Doug K. Handshoe and Jane Doe*, Yar. No: 353654.

2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the  
Judgment in favor of Trout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug  
K. Handshoe.

3. The name of the judgment debtor in the above styled case is Doug K. Handshoe,  
and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520.  
The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vaughn  
Perret is 139 Trout Point Road, Kemptonville, NS BOW 1Y0 Canada.

(GP000691.1)



or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

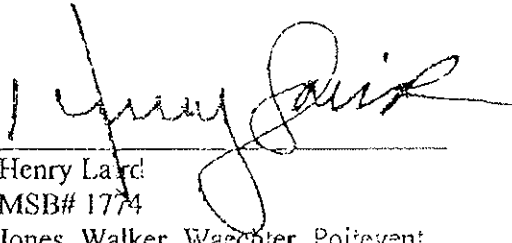
Entered & Entered  
Pro Se  
Pro Se

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe  
345 Carroll Avenue  
Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.



Henry Laird  
MSB# 1774  
Jones, Walker, Waechter, Poltevent,  
Carrère & Denègre, LLP  
2510 14th Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: hlaird@joneswalker.com

2011

IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Defendants

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

Motion was made by Trout Point Lodge, Charles Leary, and Vaughn Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughn Perret, and having heard Charles Leary and Vaughn Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

- to Trout Point Lodge: \$75,000 in general damages
- to Vaughn Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;
- to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

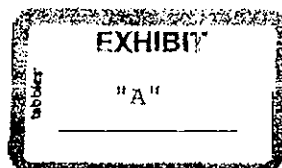
as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughn J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Slabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.

Dated 2 day of February 2012

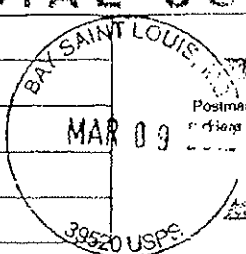


Prothonotary

Elaine L. d'Entremont  
Prothonotary



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<b>U.S. Postal Service</b>	
<b>CERTIFIED MAIL RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent To: <u>Don Handshoe</u> Street, Apt. No., or PO Box No. <u>345 Carroll Ave.</u> City, State, ZIP+4® <u>Bay St. Louis MS 39520</u>	
PS Form 3800, August 2006 See Reverse for Instructions	

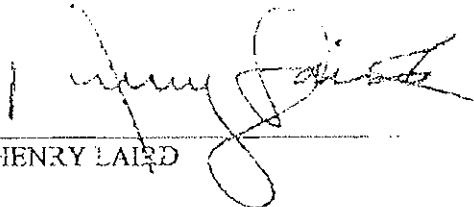
**FILED**

MAR 12 2012

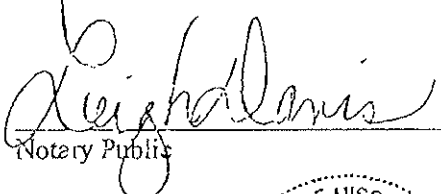
KAREN LADNER RUMBA  
CIRCUIT CLERK, HANCOCK CO.  
Car D.C.

<b>COVER SHEET</b> Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading.)		Court Identification Docket # <div style="border: 1px solid black; padding: 2px; display: inline-block;">           23 1 03         </div> County # Judicial District Court ID <div style="border: 1px solid black; padding: 2px; display: inline-block;">           03 08 12         </div> Month Date Year This area to be completed by clerk		Case # Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">           2 12 12         </div> Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">           00003         </div> Total Docket ID <div style="border: 1px solid black; padding: 2px; display: inline-block;">           00003         </div>
Mississippi Supreme Court Administrative Office of Courts Form AOC/01 (Rev 2009)		Case Number if filed prior to 1/1/94		
In the <u>CIRCUIT</u> Court of <u>HANCOCK</u> County <u>---</u> Judicial District <u>---</u>				
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal				
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form				
Individual Last Name _____ First Name _____ Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____				
Business <u>Trout Point Lodge, Ltd.</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____				
Address of Plaintiff <u>199 Trout Point Road, Kemptville, NS B0W 1Y0 Canada</u>				
Attorney (Name & Address) <u>Henry Laird, Post Office Box 160, Gulfport, MS 39502</u> MS Bar No. <u>1774</u> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____				
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form				
Individual <u>Handshoe</u> Last Name _____ First Name <u>Doug</u> Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of <u>345 Carroll Avenue, Bay St. Louis, MS</u> Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____				
Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____				
Attorney (Name & Address) - If Known _____ MS Bar No. _____				
Damages Sought: Compensatory \$ _____ Punitive \$ _____ Check (x) if child support is contemplated as an issue in this suit. *If checked, please submit completed Child Support Information Sheet with this Cover Sheet.				
Nature of Suit (Place an "X" in one box only)				
<b>Family/Personal</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce/Fault <input type="checkbox"/> Divorce/ Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (act 7/1/97; formerly U:ESA) <input type="checkbox"/> Other _____	<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input checked="" type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ <b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Monument of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____	<b>Children/Minors/Non-Domestic</b> <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ <b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ <b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ <b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale; Confirm, Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ <b>Wrongful Death</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____	

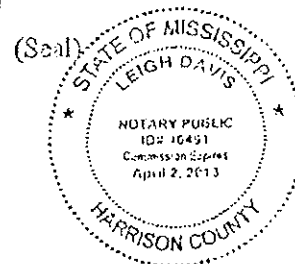
FURTHER THIS AFFIANT SAYETH NOT.

  
HENRY LAIRD

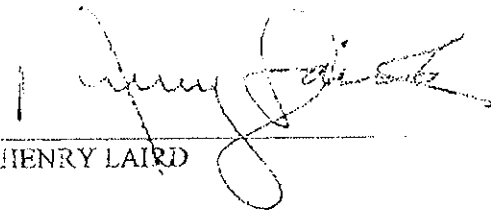
SWORN TO AND SUBSCRIBED before me, this the 8th day of March, 2012.

  
Notary Public

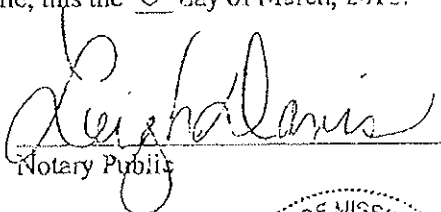
My Commission Expires:



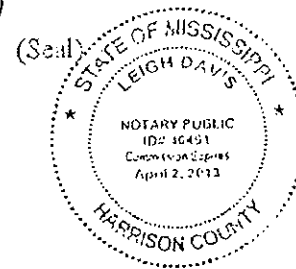
FURTHER OF HIS AFFIANT SAYETH NOT.

  
HENRY LAIRD

SWORN TO AND SUBSCRIBED before me, this the 8th day of March, 2012.

  
Notary Public

My Commission Expires:



IN THE CIRCUIT COURT OF HANCOCK COUNTY  
STATE OF MISSISSIPPI

TROUT POINT LODGE, LIMITED, )  
A Nova Scotia Limited Company; )  
VAUGHN PERRET and )  
CHARLES LEARY, )

Plaintiff, )

v. )

Civil Action No.: 12-0103

DOUG K. HANDSHOE, )

Defendant. )

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

  
\_\_\_\_\_  
G. GERALD CRUTHIRD, Esquire

Mississippi Bar No. 7926

G. GERALD CRUTHIRD, P.A.

Attorneys at Law

P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220

Facsimile: (601) 798-4591

Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

COUNSEL FOR DEFENDANT

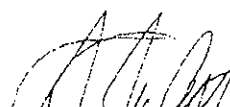


CERTIFICATE OF SERVICE

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire  
Mississippi Bar No. 1774  
Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
2510 14<sup>th</sup> Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaire@joneswalker.com](mailto:hlaire@joneswalker.com)  
*Attorneys for Plaintiff*

THIS the 26<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
G. GERALD CRUTHIRD

12-0103

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>Samir Handshoe</i></p>	
<p>1. Article Addressed to: 12-0103</p> <p><i>Doug K Handshoe</i>  <i>345 Carroll Ave.</i>  <i>Bay St Louis, MS 39520</i></p>		<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>Samir Handshoe</i></p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number 7010 1670 0001 6459 1457</p> <p>(Transfer from se. ....)</p>			

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

FILED

MAR 20 2012

KAREN LADNER RUHR  
 CIRCUIT CLERK, HANCOCK CO  
 BY *[Signature]* D.C.

7010 1670 0001 6459 1452

<b>U.S. Postal Service</b>	
<b>CERTIFIED MAIL RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a> .	
<b>OFFICIAL USE</b>	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark: **BOX SAINT LOUIS, MO MAR 09 39520 USPS**

Sent To: <u>Doug Handshoe</u>	
Street, Apt. No., or PO Box No. <u>345 Carroll Ave.</u>	
City, State, ZIP+4 <u>Box St. Louis MO 39520</u>	

PS Form 3800, August 2006 See Reverse for Instructions

**FILED**

**MAR 12 2012**

KAREN LADNER RUHR  
CIRCUIT CLERK, HANCOCK CO.  
Box Car D.C.



IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

---

CLERK'S NOTICE OF FILING FOREIGN JUDGMENT

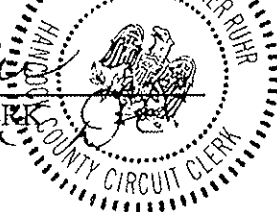
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Take notice that the Circuit Clerk of Hancock County, Mississippi has enrolled a judgment in favor of Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, whose post office address is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada and whose attorney is Henry Laird of the law firm of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, located at 2510 14<sup>th</sup> Street, Gulfport, Mississippi. The Defendant/Judgment Debtor is Doug K. Handshoe whose last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520, and this Notice of Filing Foreign Judgment is being mailed by the Hancock County, Mississippi Circuit Clerk to that address.

A true and correct copy of the Foreign Judgment is attached hereto as Exhibit "A".

This the 8<sup>th</sup> day of March, 2012.

By: Karen L. Rucker  
CIRCUIT COURT CLERK  
By: K. Rucker



2011

Yar.No. 3536

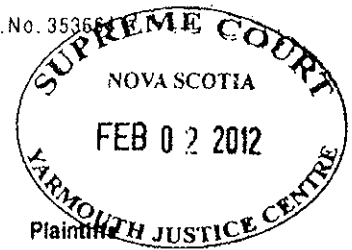


IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe



Defendants

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

Motion was made by Trout Point Lodge, Charles Leary, and Vaughn Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughn Perret, and having heard Charles Leary and Vaughn Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

- to Trout Point Lodge: \$75,000 in general damages
- to Vaughn Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;
- to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughn J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.

Dated 7 day of February, 2012



Prothonotary

Elaine L. d'Entremont  
Prothonotary

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

Elaine L. d'Entremont  
Prothonotary

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

---

MOTION TO ENROLL FOREIGN JUDGMENT

---

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8<sup>th</sup> day of March, 2012.

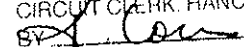
Trout Point Lodge, Limited, Vaughn Perret and  
Charles Leary, Judgment Creditors

By:

  
Henry Laird, Mississippi Bar No. 1774

FILED

MAR 08 2012

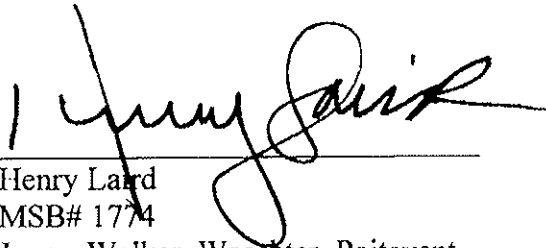
KAREN LADNER RUHR  
CIRCUIT CLERK, HANCOCK CO.  
BY  D.C.

**CERTIFICATE OF SERVICE**

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe  
345 Carroll Avenue  
Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.



Henry Laird  
MSB# 1774  
Jones, Walker, Wacchter, Poitevent,  
Carrère & Denègre, LLP  
2510 14th Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: hlaird@joneswalker.com

2011

Yar. No. 3536

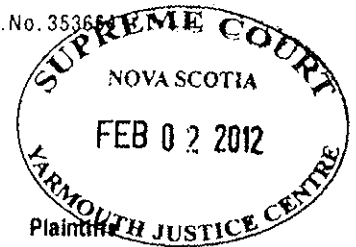


IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe



Defendants

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

A motion was made by Trout Point Lodge, Charles Leary, and Vaughn Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughn Perret, and having heard Charles Leary and Vaughn Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

- to Trout Point Lodge: \$75,000 in general damages
- to Vaughn Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;
- to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughn J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.

Dated 7 day of February, 2012



Prothonotary

Elaine L. d'Entremont  
Prothonotary

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

Elaine L. d'Entremont  
Prothonotary

Prothonotary

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

**TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY**

**PLAINTIFFS**

**VERSUS**

**CAUSE NO: \_\_\_\_\_**

**DOUG K. HANDSHOE**

**DEFENDANT**

---

AFFIDAVIT OF HENRY LAIRD

---

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, says the following things are true:

1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: *Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leary -and- Doug K. Handshoe and Jane Doe*, Yar. No: 353654.

2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of Trout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.

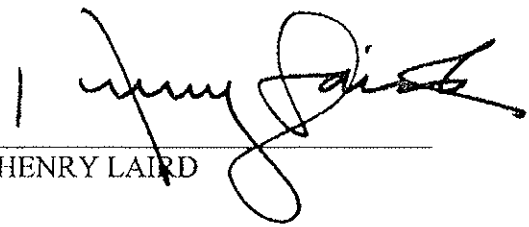
3. The name of the judgment debtor in the above styled case is Doug K. Handshoe, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vaughn Perret is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada.

{GP000691.1}

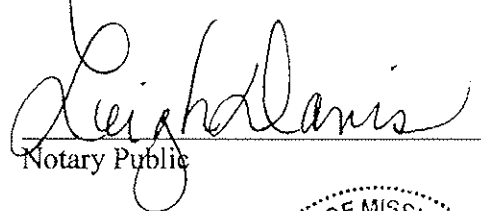




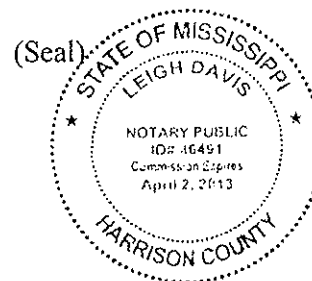
FURTHER THIS AFFIANT SAYETH NOT.

  
HENRY LAIRD

SWORN TO AND SUBSCRIBED before me, this the 8<sup>th</sup> day of March, 2012.

  
Notary Public

\_\_\_\_\_  
My Commission Expires:



<b>COVER SHEET</b>		Court Identification Docket #		Case Year	Docket Number
<b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		<div style="border: 1px solid black; padding: 2px;">23</div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">07</div>	<div style="border: 1px solid black; padding: 2px;">20</div> <div style="border: 1px solid black; padding: 2px;">12</div>	<div style="border: 1px solid black; padding: 2px;">00</div> <div style="border: 1px solid black; padding: 2px;">10</div> <div style="border: 1px solid black; padding: 2px;">3</div>	<div style="border: 1px solid black; padding: 2px;">00</div> <div style="border: 1px solid black; padding: 2px;">10</div> <div style="border: 1px solid black; padding: 2px;">3</div>
		County #    Judicial    Court ID District    (CH, CI, CO)	Local Docket ID		
		<div style="border: 1px solid black; padding: 2px;">03</div> <div style="border: 1px solid black; padding: 2px;">08</div> <div style="border: 1px solid black; padding: 2px;">12</div>			
Mississippi Supreme Court    Form AOC/01 Administrative Office of Courts    (Rev 2009)		Month    Date    Year This area to be completed by clerk		Case Number if filed prior to 1/1/94	
In the <u>CIRCUIT</u>		Court of <u>HANCOCK</u>		County <u>---</u>	Judicial District <u>---</u>
<b>Origin of Suit (Place an "X" in one box only)</b>					
<input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
<b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b>					
<b>Individual</b>					
Last Name    First Name    Maiden Name, if applicable    M.I.    Jr/Sr/III/IV Check ( x ) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ Check ( x ) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b> <u>Trout Point Lodge, Ltd.</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check ( x ) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____					
<b>Address of Plaintiff</b> <u>189 Trout Point Road, Kemptville, NS B0W 1Y0 Canada</u>					
<b>Attorney (Name &amp; Address)</b> <u>Henry Laird, Post Office Box 160, Gulfport, MS 39502</u> <b>MS Bar No.</b> <u>1774</u> Check ( x ) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing:					
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b>					
<b>Individual</b> <u>Handshoe</u> <u>Boud</u> Last Name    First Name    Maiden Name, if applicable    K.    Jr/Sr/III/IV M.I. _____ Check ( x ) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of <u>345 Carroll Avenue, Bay St. Louis, MS</u> Check ( x ) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b> _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check ( x ) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____					
<b>Attorney (Name &amp; Address) - If Known</b> _____ <b>MS Bar No.</b> _____					
<b>Damages Sought:</b> Compensatory \$ _____    Punitive \$ _____    Check ( x ) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
<b>Nature of Suit (Place an "X" in one box only)</b>					
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input checked="" type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ <b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____		<b>Children/Minors - Non-Domestic</b> <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ <b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ <b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ <b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	
<b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____		<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ <b>Torts</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____			

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
 File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_  
 Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

**PLAINTIFFS IN REFERENCED CAUSE - Page 1 of \_\_\_\_ Plaintiffs Pages**  
**IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Plaintiff #2:**

**Individual:** Perret Last Name Vaughn First Name ( \_\_\_\_\_ Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of 189 Trout Road, Kemptville, NS B0W 1Y0 Canada

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 1774 Bar # or Name: Henry Laird Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

**Plaintiff #3:**

**Individual:** Leary Last Name Charles First Name ( \_\_\_\_\_ Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of 189 Trout Road, Kemptville, NS B0W 1Y0 Canada

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 1774 Bar # or Name: Henry Laird Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

**Plaintiff #4:**

**Individual:** \_\_\_\_\_ Last Name \_\_\_\_\_ First Name ( \_\_\_\_\_ Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_



*Lawyers at Watkins Ludlam Winter & Siennis, P.A. joined the law firm of Jones Walker effective November 5, 2011, and will continue to provide legal services under the name of Jones Walker.*

Henry F. Laird  
Not admitted in Alabama  
hlaird@joneswalker.com

March 8, 2012

FILED

Karen Ladner Ruhr  
Circuit Court Clerk  
152 Main Street, Suite B  
Bay St. Louis, Mississippi 39520

MAR 08 2012  
KAREN LADNER RUHR  
CIRCUIT CLERK, HANCOCK CO.  
BY: [Signature] D.C.

**RE: Trout Point Lodge, Limited, a Nova Scotia Limited Company; Vaughn Perret  
and Charles Leary v. Doug K. Handshoe**

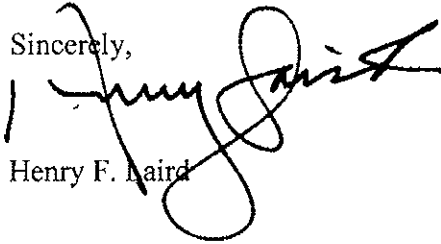
Dear Ms. Ruhr:

Enclosed for filing please find the following:

1. Civil Cover Sheet and check in the amount of \$120.00 which represents payment of your filing fee;
2. Motion to Enroll Foreign Judgment;
3. Clerk's Notice of Filing Foreign Judgment.

I have attached extra copies of the aforementioned documents which I would appreciate your returning stamped "filed".

Sincerely,

  
Henry F. Laird

HFL  
Enclosures

JONES, WALKER, WAECHTER, POITEVENT, CARRÈRE & DENÈGRE L.L.P.

2510 14TH STREET • SUITE 1125 (39501) • P.O. DRAWER 160 GULFPORT, MISSISSIPPI 39502-0160 228-864-3094 FAX 228-864-0516 [www.joneswalker.com](http://www.joneswalker.com)  
ALABAMA ARIZONA DISTRICT OF COLUMBIA FLORIDA LOUISIANA MISSISSIPPI TEXAS

## FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi  
Hancock County

TROUT POINT LODGE, LIMITED ET AL VS HANDSHOE, DOUG K.

Case # 12-0103                      Acct #                      Paid By CHECK 302032                      Rct# 25192

CLERK'S FEES	85.00
JURY TAX	3.00
COURT REPORTERS FEE	10.00
LAW LIBRARY	2.50
COURT ADMINISTRATOR	2.00
STATE CT ED FUND	2.00
COURT CONSTITUENTS	.50
ELECTRONIC COURT	10.00
LEGAL ASSISTANCE	5.00

=====

Total      \$      120.00

## FOREIGN JUDGMENT

Payment received from Henry Laird  
PO Drawer 160  
2510 14th St. Suite 1010  
  
Gulfport                      MS 39502

Transaction    21863 Received    3/ 8/2012 at 13:49 Drawer    1 I.D. KATHARINE

Current Balance Due                      \$0.00                      Receipt Amount \$                      120.00

By K. Can D.C. Karen Ladner Ruhr, Circuit Clerk

Case # 12-0103                      Acct #                      Paid By CHECK 302032                      Rct# 25192



KATHARINE MCMURPHY 03/28/2012 11:31 MCR4 Circuit Court System

PAGE 1

Batch Print Documents For:

Case Number 12-0103 thru 12-0103  
Filing Date / / thru / /  
Entry Date / /

Report ID CASE

Case Number	Filing Date	Event Desc.	Entry Date	Pg	MS23CC	AEV00119119994	0001
12-0103	3/ 8/2012	Notice of Filing	3/26/2012	21	MS23CC	AEV00119119994	0001
12-0103	3/ 8/2012	Green Card exec	3/20/2012	1	MS23CC	AEV00119119995	0001
12-0103	3/ 8/2012	Foreign Judgment	3/12/2012	1	MS23CC	AEV00119119996	0001
12-0103	3/ 8/2012	Clerk's Notice	3/ 8/2012	3	MS23CC	AEV00119119997	0001
12-0103	3/ 8/2012	Motion to Enrol	3/ 8/2012	10	MS23CC	AEV00119119998	0001
Records Processed....	5						

Total Pages Printed.. 36